## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF OKLAHOMA

UNITED STATES OF AMERICA,	)
Plaintiff,	
-vs-	No. M-20-451-P
VIPAL, INC.,	Violation: 8 U.S.C. § 1324a(a)(2) 8 U.S.C. § 1324a(f)(1)
Defendant.	

## INFORMATION

The United States Attorney charges:

## Introduction

At all times relevant to this Information:

1. VIPAL, INC., operated two restaurants in Stillwater, Oklahoma, called Palominos Authentic Mexican Restaurant ("Palominos") and El Vaquero Mexican Restaurant ("El Vaquero").

## Counts 1 through 35 (Continuing Employment of Unauthorized Aliens)

- 2. The United States Attorney incorporates paragraph 1.
- 3. From in or about August 2017, to on or about September 4, 2019, in the Western District of Oklahoma,

engaged in a practice and pattern of continuing to employ in the United States certain aliens, as specified in the table below, knowing that said aliens were unauthorized aliens (as defined in Title 8 United States Code, Section 1324a(a)(h)(3)), with respect to such employment.

Count	Location	Name
1	El Vaquero	Ayala, Betsabet
2	El Vaquero	Cano-Reyes, Karina
3	El Vaquero	Cazares-Mata, Miguel Angel
4	El Vaquero	Flores-Contreras, Hector
5	El Vaquero	Gomes-Hernandez, Amalio
6	El Vaquero	Gomez-Diaz, Eleazar
7	El Vaquero	Gomez-Hernandez, Omar
8	El Vaquero	Herrera, Adriana
9	El Vaquero	Herrera-Perez, Ernesto
10	El Vaquero	Hernandez, Miriam
11	El Vaquero	Herrera-Rodroguez, Edtor Uriel
12	El Vaquero	Leon-Tovar, Jose Fernando
13	El Vaquero	Lopez-Gomez, Andres
14	El Vaquero	Luna, Ana Valentina
15	El Vaquero	Nieto-Vazquez, Rosalva
16	El Vaquero	Herrera-Perez, Sanjuana
17	El Vaquero	Villasenor, Ana B.
18	El Vaquero	Villasenor, Maria Guadalupe
19	Palominos	Alvarado-Cano, Hilda
20	Palominos	Diaz-Mendez, Guillermo
21	Palominos	Fuentes, Maria Del Rosario
22	Palominos	Gomez, Oriana
23	Palominos	Herrera, Adriana
24	Palominos	Hernandez, Jovani
25	Palominos	Hernandez, Natanael
26	Palominos	Hernandez-Alvarez, Juan Carlos
27	Palominos	Hernandez-Mendoza, Esau

28	Palominos	Hernandez-Moreno, Benido
29	Palominos	Leon-Tovar, Jesus Alberto
30	Palominos	Martinez, Alfonso
31	Palominos	Melendez, Gabriel
32	Palominos	Ortega, Emily
33	Palominos	Perez-Mendoza, Jesus Antonio
34	Palominos	Sanchez, Miguel
35	Palominos	Sanchez-Martinez, Juventino

All in violation of Title 8, United States Code, Section 1324a(a)(2) and 1324a(f)(1).

TIMOTHY J. DOWNING United States Attorney

WILLIAM E. FARRIOR
Assistant United States Attorney